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Environmental Cleanup Office

November 10, 2003

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Portland, OR 97204

Tara Martich  
US Environmental Protection Agency, Region 10  
1200 Sixth Ave, M/S ECL-115  
Seattle, WA 98104

**Re: Lower Willamette River, Portland Harbor Superfund Site**  
**USEPA Docket No: CERCLA-10-2001-0240**  
**Monthly Progress Report for October 2003**



Dear Mr. Humphrey and Ms. Martich:

This monthly status report contains information required by the Portland Harbor Superfund Site Administrative Order on Consent.

## 1. ACTIONS TAKEN IN OCTOBER 2003

The following activities were taken in October 2003 to comply with the AOC:

- The LWG continued revising the RI/FS Programmatic Work Plan based on discussions of Category 3b comments during EPA-LWG technical subgroup meetings held in October.
- Development of the Round 1 site characterization summary report was initiated.
- Development of the ecological preliminary risk evaluation was initiated.
- The September 2003 Monthly Progress Report was submitted to EPA.

## 2. RESULTS OF SAMPLING, TESTS AND OTHER DATA RECEIVED

- The LWG completed the validation of Round 1 sediment and tissue chemistry data on October 1.
- The Round 1 tissue sampling and analysis information requested in EPA's letter approving the Round 1 Field Sampling Report was submitted on October 22.
- Validated Round 1 sediment congeners and tissue chemistry data were posted on the Portland Harbor Collaboration Portal server on October 27 for use by EPA and its partners.
- The LWG Existing Database has been updated. The changes included the addition of sediment data from ARCO terminal 22T (WLCARI99) and Willbridge 60-inch outfall (WLCWTI00), water data from McCormick and Baxter September 2002 sampling (WLCMBI02), and bioassay data from the Zidell property (WLCZDI00). Several samples were also identified as having been dredged; these samples were flagged in the

sampling\_reason field of the samples table. The final changes since the last version were switching ammonia, TOC, and sulfides results in survey PPTLDT24 and pesticide and PCB results in surveys WLR0488, WLR0988, WLR0692, and MCAL1286 from Category 2 to Category 1.

### **3. SCHEDULE FOR THE NEXT TWO MONTHS**

The work described in the AOC that is planned for the months of November and December 2003 includes:

- The updated LWG existing database will be posted on the Portland Harbor Collaboration portal in November.
- Preparation of the Round 1 site characterization summary report will continue.
- Preparation of the ecological preliminary risk evaluation report will continue.
- Continue to monitor sediment stakes on a quarterly basis
- Prepare and submit the revised draft final RI/FS Programmatic Work Plan.
- Prepare and submit a revised Round 2A Field Sampling Plan following receipt of EPA comments.

Pending products currently under preparation by LWG and scheduled for submittal over the next two months are listed in Table 1.

### **4. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS AND SOLUTIONS**

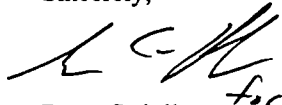
The LWG received a letter from EPA on October 23, 2003 directing the LWG to perform further validation and quality assurance review of Round 1 tissue sample analytical results. The impact of EPA's request on the Round 1 data evaluation and reporting schedule is not clear. The LWG proposes that its chemists discuss the issues raised in EPA's letter with appropriate EPA staff to clarify EPA's concerns and to establish a process to resolve those concerns.

### **5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE**

EPA comments or approvals have not been received on a number of milestones and documents that have been submitted to EPA as required by the AOC; these documents and milestones are listed in Table 2. The LWG requests document/milestone approvals to verify that the terms of the AOC are being met and issues are resolved to maintain progress on the RI/FS.

If you have any questions, please give me a call at (206) 241-5185.

Sincerely,



Betsy Striplin

RI/FS Coordinator

Copies:     Jim Anderson, ODEQ  
               Rick Kepler, ODFW  
               Dave Stone, ODHS  
               Ted Buerger, USFWS  
               Helen Hillman, NOAA  
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               Brian Cunninghame, Confederated Tribes of Warm Springs  
               Paul Ward, Confederated Tribes of Yakama Nation  
               Rod Thompson, Confederated Tribes of Grand Ronde  
               Tom Downey, Confederated Tribes of Siletz  
               Audie Huber, Confederated Tribes of Umatilla  
               Rick Eichstaedt, Nez Perce Tribe  
               Valerie Lee, Environment International  
               LWG Repository

Table 1. Status of LWG Products Pending Delivery to EPA (November/December 2003).

<b>Deliverable/Milestone Description</b>	<b>Status</b>	<b>Review/Submittal Dates</b>
Cultural Resources Technical Memorandum	Awaiting Statement of Work from EPA	Pending
Revised Draft Final RI/FS Programmatic Work Plan	In preparation	<u>November 26, 2003</u>
<u>Further data validation and quality assurance review of Round 1 tissue sample analysis results</u>	<u>Pending</u>	<u>Pending</u>

Underline indicates text change from September 2003 Monthly Progress Report.

Table 2. Status of Portland Harbor Deliverables that are Under EPA Review (October 31, 2003).

<b>Deliverable/Milestone Description</b>	<b>Date of Draft Deliverable or Request</b>	<b>Date EPA Comments Received</b>	<b>Status/Action Taken</b>
Technical Memorandum: Proposed Database Approach	December 20, 2001	Pending	Pending
Technical Memorandum: Data Quality Objectives for Historical Data	December 20, 2001	Pending	Pending
STA/Historic Bathymetry Integration Report	April 26, 2002	Pending	Pending
SPI Survey	April 26, 2002	Pending	Pending
Historical Database	April 26, 2002	Pending	Pending
Plant and Amphibian Reconnaissance Survey Technical Memorandum	February 2003	Pending	Pending
Seep Reconnaissance Technical Memorandum	February 18, 2003	Pending	Pending
Summer 2002 Bathymetry Data Report	February 26, 2003	Pending	Pending
Summary of Round 1 Field Activities	February 28, 2003	Pending	Pending
Programmatic Work Plan	March 31, 2003	July 25, 2003	Revised Interim Draft Work Plan submitted September 26, 2003
Adult Lamprey Harvest Technical Memorandum	April 4, 2003	Pending	Pending
Hydrodynamic/Sedimentation Modeling Approach Technical Memorandum	April 4, 2003	Pending	Pending
Round 2A Field Sampling Plan	April 17, 2003	Pending	Pending
Proposed Fish Consumption Rates	May 9, 2003	Pending	Pending

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Technical Memorandum			
2002 Sediment Stake Erosion/Accretion Monitoring Report	May 15, 2003	Pending	Pending
Response to EPA comments on Round 1 RI/FS Work Plan and Field Sampling Plan	May 16, 2003	Pending	Pending
(Revised) Benthic Analysis Approach Technical Memorandum	May 20, 2003	Draft submitted January 13, 2003; comments on draft received through verbal communications in management and subgroup meetings, as well as in written comments. Comments on revision pending.	Pending
Historical Chemistry Data Category Reclassification Technical Memorandum	May 30, 2003	Pending	Pending
Upland Groundwater Data Review Report	June 2, 2003	Pending	Pending
Framework for Evaluating Exposure to the Benthic Community and Humans from Chemicals Transported in Groundwater	August 1, 2003	Pending	Pending
Verbal request from LWG for copies of Revised RI/FS Programmatic Work Plan comments from EPA partners	August 22, 2003	Pending	Pending
Revised Interim Draft RI/FS Programmatic Work Plan	September 26, 2003	Pending	Pending

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Deliverable/Milestone Description	Date of Draft Deliverable or Request	Date EPA Comments Received	Status/Action Taken
<u>Letter request from LWG for extension to submit revised draft final RI/FS Work Plan three weeks from receipt of EPA comments on the Draft Round 2A Field Sampling Plan</u>	<u>October 15, 2003</u>	<u>October 23, 2003</u>	<u>EPA granted extension to submit revised draft final RI/FS Work Plan by November 26, 2003.</u>
<u>Round 1 Tissue Sample Collection and Archive Information Summary Tables</u>	<u>October 22, 2003</u>	<u>Pending</u>	<u>Pending</u>

Underline indicates text change from September 2003 Monthly Progress Report.

Shading indicates action completed. Completed actions will be deleted after one month.